

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WISCONSIN  
MADISON DIVISION**

Brian Heckel, Individually and as Special Administrator for the Purposes of This Lawsuit on Behalf of Sharon Heckel, Deceased,

Plaintiffs,  
v.

3M Company, et al.,

**Case No. 13-cv-459**

Defendants.

---

**Notice of Service of Plaintiff's Expert Witness Disclosures and Reports**

---

TAKE NOTICE that on January 30, 2015, Plaintiff's counsel served Plaintiff's Expert Witness Disclosures and Reports via email <sup>1</sup> to all counsel of record outlined on the attached Plaintiff's Statement of Expert Witness Disclosures and Reports.

Dated: January 30, 2015

Respectfully submitted,

/S/ Robert G. McCoy

Robert G. McCoy  
Attorney for Plaintiff  
Cascino Vaughan Law Offices, Ltd.  
220 S. Ashland Avenue  
Chicago, Illinois 60607  
Phone: 312-944-0600  
Fax: 312-944-1870  
Email: bmccoy@cvlo.com  
Email: ecf.cvlo@gmail.com

---

<sup>1</sup>Reports and Disclosures served using the web-based file transfer service Hightail (f/k/a YouSendIt.)

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WISCONSIN  
MADISON DIVISION**

Brian Heckel, Individually and as Special Administrator for the Purposes of This Lawsuit on Behalf of Sharon Heckel, Deceased,

Plaintiffs,  
v.

3M Company, et al.,

**Case No. 13-cv-459**

Defendants.

---

**Plaintiff's Statement of Expert Witness Disclosures and Reports**

---

Plaintiff identifies the following expert witnesses. Their reports and Rule 26(a)(2)(B) disclosures have been served to counsel of record via email on January 30, 2015. Plaintiff reserves the right to submit additional reports in rebuttal or for other good cause.

**Retained Experts**

**Plaintiff-specific reports**

1. Dr. Henry A. Anderson
2. Frank M. Parker III - CIH

**General reports:**

- a. Dr. Henry A. Anderson report re: Roddis/Weyerhaeuser Marshfield door plant mesothelioma and lung cancer cases (January 30, 2015.)
- b. Dr. Arnold R. Brody Report re: Asbestos Induced Lung Disease (Oct. 14, 2011)
- c. Frank M. Parker III report re: Asbestos - Worker, Community, and Household Exposures Roddis Plywood Co. / Weyerhaeuser Co. Fire Door Manufacturing Operations Marshfield, WI (January, 2015)

**Non-retained experts**

The following witnesses are expected to testify about:

- medical care and treatment of the injured party, including without limitation, matters expressed in medical records,
- the pre-existing health of the injured party before the alleged asbestos related condition (including whether any pre-existing condition is life threatening or shortening),
- future medical care and treatment needed,
- whether the condition at issue is related to exposure to asbestos (if any opinion on this).

Summary of the facts and opinions on which the witnesses are expected to testify: The witnesses are expected to testify to treatment as disclosed in the medical records and to opinions formed in the course of the treatment he provided, and future medical care and treatment reasonably expected to be needed.

**Non-retained experts**

- 1a. Oncologist: Dr. Elena Theodosiou  
Portsmouth Hematology and Oncology Center  
155 Borthick Ave. Ste. 301  
Portsmouth, NH  
(603) 294-1231
- 1b. General Physician: Dr. Thomas Stoffel  
Edgar Clinic  
103 South 3rd. Ave.  
(715) 352-2333
- 1c. Pulmonologist: Dr. John D. Crump  
Marshfield Clinic  
1000 N. Oak Ave.  
Marshfield, WI 54449  
(715) 358-1888

Dated: January 30, 2015

Respectfully submitted,

/S/ Robert G. McCoy  
Robert G. McCoy  
Attorney for Plaintiff  
Cascino Vaughan Law Offices, Ltd.

220 S. Ashland Avenue  
Chicago, Illinois 60607  
Phone: 312-944-0600  
Fax: 312-944-1870  
Email: bmccoy@cvlo.com  
Email: ecf.cvlo@gmail.com